

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 2

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR REPLY IN SUPPORT OF DAUBERT MOTION
FOR RALPH ZIPPER, M.D. FOR WAVE 2 CASES**

Come now the Defendants, and hereby adopt and incorporate by reference their reply in support of the *Daubert* motion filed against Ralph Zipper, M.D. for Ethicon Wave 1, Dkt. No. 2221. This Notice applies to the Wave 2 cases identified in Exhibit A to Defendant's Notice of Adoption of Daubert Motion for Ralph Zipper, M.D. for Wave 2 cases. Defendants respectfully request that the Court exclude Dr. Zipper's testimony, for the reasons expressed in the Wave 1 briefing.

Dated: August 17, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

Christy D. Jones